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*Attorneys for Levin Simes Plaintiffs*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

## This Document Relates to:

Jane Doe LS 90 v. Uber Technologies, Inc., et al., No. 3:23-cv- 03956-CRB

Jane Doe LS 250 v. Uber Technologies, Inc., et al., No. 3:23-cv- 03995-CRB

Jane Doe LS 383 v. Uber Technologies, Inc., et al., No. 3:23-cv- 05197-CRB

Jane Doe LS 107 v. Uber Technologies, Inc., et al., No. 3:23-cv- 05232-CRB

Jane Doe LS 353 v. Uber Technologies, Inc., et al., No. 3:23-cv- 05401-CRB

Jane Doe LS 285 v. Uber Technologies, Inc., et al., No. 3:23-cv- 05919-CRB

Jane Doe LS 330 v. Uber Technologies, Inc., et al., No. 3:24-cv- 05160-CRB

Case No. 3:23-md-03084-CRB

**DECLARATION OF WILLIAM A. LEVIN  
IN SUPPORT OF LEVIN SIMES  
PLAINTIFFS' OPPOSITION TO  
DEFENDANTS UBER TECHNOLOGIES,  
INC., RASIER, LLC, AND RASIER-CA,  
LLC'S MOTION TO DISMISS LEVIN  
SIMES CASES FOR FAILURE TO  
COMPLY WITH DISCOVERY ORDERS**

Judge: Honorable Charles R. Breyer  
Date: July 11, 2025  
Time: 10:00 a.m.  
Courtroom: 6 – 17th Floor

1 Jane Doe LS 419 v. Uber Technologies,  
2 Inc., et al., No. 3:24-cv- 05263-CRB  
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4 Jane Doe LS 412 v. Uber Technologies,  
5 Inc., et al., No. 3:24-cv- 05317-CRB  
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7 Jane Doe LS 492 v. Uber Technologies,  
8 Inc., et al., No. 3:24-cv- 05324-CRB  
9  
10 Jane Doe LS 338 v. Uber Technologies,  
11 Inc., et al., No. 3:24-cv- 05326-CRB  
12  
13 Jane Doe LS 252 v. Uber Technologies,  
14 Inc., et al., No. 3:24-cv- 05334-CRB  
15  
16 Jane Doe LS 225 v. Uber Technologies,  
17 Inc., et al., No. 3:24-cv- 05336-CRB  
18  
19 Jane Doe LS 131 v. Uber Technologies,  
20 Inc., et al., No. 3:24-cv- 05337-CRB  
21  
22 Jane Doe LS 128 v. Uber Technologies,  
23 Inc., et al., No. 3:24-cv- 05377-CRB  
24  
25 Jane Doe LS 281 v. Uber Technologies,  
26 Inc., et al., No. 3:24-cv- 05430-CRB  
27  
28 Jane Doe LS 507 v. Uber Technologies,  
Inc., et al., No. 3:24-cv- 05509-CRB  
Jane Doe LS 500 v. Uber Technologies,  
Inc., et al., No. 3:24-cv- 05513-CRB  
Jane Doe LS 101 v. Uber Technologies,  
Inc., et al., No. 3:24-cv- 05521-CRB  
Jane Doe LS 506 v. Uber Technologies,  
Inc., et al., No. 3:24-cv- 05531-CRB  
Jane Doe LS 473 v. Uber Technologies,  
Inc., et al., No. 3:24-cv- 05544-CRB  
Jane Doe LS 47 v. Uber Technologies,  
Inc., et al., No. 3:24-cv- 05571-CRB  
Jane Doe LS 482 v. Uber Technologies,  
Inc., et al., No. 3:24-cv- 05593-CRB  
Jane Doe LS 476 v. Uber Technologies,  
Inc., et al., No. 3:24-cv- 05646-CRB  
Jane Doe LS 467 v. Uber Technologies,  
Inc., et al., No. 3:24-cv- 05652-CRB

1 Jane Doe LS 509 v. Uber Technologies,  
 2 Inc., et al., No. 3:24-cv- 05662-CRB

3 Jane Doe LS 449 v. Uber Technologies,  
 4 Inc., et al., No. 3:24-cv- 05689-CRB  
 5 Jane Doe LS 435 v. Uber Technologies,  
 6 Inc., et al., No. 3:24-cv- 05755-CRB

7 Jane Doe LS 452 v. Uber Technologies,  
 8 Inc., et al., No. 3:24-cv- 05756-CRB

9 Jane Doe LS 422 v. Uber Technologies,  
 10 Inc., et al., No. 3:24-cv- 05758-CRB

11 Jane Doe LS 519 v. Uber Technologies,  
 12 Inc., et al., No. 3:24-cv- 05759-CRB

13 Jane Doe LS 429 v. Uber Technologies,  
 14 Inc., et al., No. 3:24-cv- 05797-CRB

15 Jane Doe LS 434 v. Uber Technologies,  
 16 Inc., et al., No. 3:24-cv- 05814-CRB

17 Jane Doe LS 417 v. Uber Technologies,  
 18 Inc., et al., No. 3:24-cv- 05821-CRB

19 Jane Doe LS 469 v. Uber Technologies,  
 20 Inc., et al., No. 3:24-cv- 05874-CRB

21 Jane Doe LS 289 v. Uber Technologies,  
 22 Inc., et al., No. 3:24-cv- 05883-CRB

23 Jane Doe LS 366 v. Uber Technologies,  
 24 Inc., et al., No. 3:24-cv- 05886-CRB

25 Jane Doe LS 355 v. Uber Technologies,  
 26 Inc., et al., No. 3:24-cv- 05887-CRB

27 Jane Doe LS 300 v. Uber Technologies,  
 28 Inc., et al., No. 3:24-cv- 05900-CRB

29 Jane Doe LS 267 v. Uber Technologies,  
 30 Inc., et al., No. 3:24-cv- 05901-CRB

31 Jane Doe LS 173 v. Uber Technologies,  
 32 Inc., et al., No. 3:24-cv- 05907-CRB

33 Jane Doe LS 169 v. Uber Technologies,  
 34 Inc., et al., No. 3:24-cv- 05918-CRB

35 Jane Doe LS 324 v. Uber Technologies,  
 36 Inc., et al., No. 3:24-cv- 05920-CRB

37 Jane Doe LS 124 v. Uber Technologies,  
 38 Inc., et al., No. 3:24-cv- 05930-CRB

1 Jane Doe LS 132 v. Uber Technologies,  
2 Inc., et al., No. 3:24-cv- 05934-CRB

3 Jane Doe LS 45 v. Uber Technologies,  
4 Inc., et al., No. 3:24-cv- 05935-CRB

4 Jane Doe LS 243 v. Uber Technologies,  
5 Inc., et al., No. 3:24-cv- 05939-CRB

6 Jane Doe LS 192 v. Uber Technologies,  
7 Inc., et al., No. 3:24-cv- 05975-CRB

8 Jane Doe LS 5 v. Uber Technologies,  
9 Inc., et al., No. 3:24-cv-05976-CRB

10 Jane Doe LS 288 v. Uber Technologies,  
11 Inc., et al., No. 3:24-cv- 05987-CRB

12 Jane Doe LS 160 v. Uber Technologies,  
13 Inc., et al., No. 3:24-cv- 05996-CRB

14 Jane Doe LS 327 v. Uber Technologies, Inc., et  
15 al., No. 3:24-cv- 06032-CRB

16 LEVIN SIMES LLP  
17 1700 Montgomery Street, Suite 250  
18 San Francisco, California 94111  
19 415.426.3000 phone • 415.426.3001 fax

1       I, William A. Levin declare as follows:

2       1. I am an attorney who is duly licensed to practice law before all courts of the State of  
 3 California. I am a partner the law firm Levin Simes LLP, and counsel of record for all Jane Doe  
 4 LSA and Jane Doe LS Plaintiffs in MDL No. 3084. I make this declaration of my personal  
 5 knowledge. If called as a witness, I could and would competently testify to the matters set forth  
 6 herein.

7       2. This declaration is made in support of Levin Simes Plaintiffs' Opposition to Defendants  
 8 Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion to Dismiss Levin Simes  
 9 Cases for Failure to Comply with Discovery Orders.

10      3. Since this issue was raised in late December 2024, our firm has been able to cure

11      4. over seventy percent of the fact sheet deficiencies, and we expect we will continue to cure  
 12 them.

13      5. Our firm's efforts to reach the Plaintiff subject to Uber's motion include numerous phone  
 14 calls, emails, texts, written letters, and address searches. We also employed investigators to trace  
 15 new contact information for these individuals.

16      6. Uber identifies 52 Plaintiffs, however in the time between Uber's filing of its moving  
 17 papers and the filing of this brief, Levin Simes produced seven additional fact sheets:

- 18           a. Jane Doe LS 90
- 19           b. Jane Doe LS 419
- 20           c. Jane Doe LS 128
- 21           d. Jane Doe LS 469
- 22           e. Jane Doe LS 289
- 23           f. Jane Doe LS 267
- 24           g. Jane Doe LS 327

25      7. Further, three of the Plaintiffs subject to Uber's motion are currently incarcerated, and one  
 26 Plaintiff is deceased.

27      8. Uber brought a similar request in the JCCP before Judge Schulman. Judge Schulman

1 denied the request because the cases were stayed, and bellwethers were already selected.

2 I declare under penalty of perjury under the laws of the United States of America that the  
3 foregoing is true and correct. Executed on May 30, 2025, in San Francisco, California.

4 Respectfully Submitted,

5 /s/ William A. Levin  
6 William A. Levin  
7 Attorney for LS Plaintiffs

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1                   **CERTIFICATE OF SERVICE**

2 I hereby certify that on April 23, 2025, I electronically filed the foregoing document with the  
3 Clerk of the Court using the CM/ECF system, which will automatically send notification of the  
4 filing to all counsel of record.

5                   */s/ William A. Levin*

6                   William A. Levin

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